

LAW OFFICES OF STEPHENSON, ACQUISTO &  
COLMAN  
500 North Brand Blvd, Suite 1450  
Glendale, CA 91203  
(818) 559-4477

SCOTT B. VAN ALFEN (NEVADA BAR 5532)  
LOCAL COUNSEL  
690 Magnum Ct.  
Henderson, NV 89052  
(818) 559-4477  
Svalfen@sacfirm.com

Attorney for Plaintiffs, DIGNITY HEALTH, a  
California non-profit public benefit corporation, d/b/a  
ST. ROSE DOMINICAN HOSPITAL-SIENA  
CAMPUS

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

DIGNITY HEALTH, a California non-  
profit public benefit corporation, d/b/a ST.  
ROSE DOMINICAN HOSPITAL,

Plaintiff,

vs.

SILVERSUMMIT HEALTH PLAN, INC.;  
DOES 1 THROUGH 25; AND ROES 1  
THROUGH 25,

Defendants.

Case No.: 2:25-cv-00576-JAD-EJY

STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME TO  
RESPOND TO DEFENDANT'S MOTION  
TO DISMISS BY NOT MORE THAN 10  
DAYS (L.R. 6-1)  
(FIRST REQUEST TO EXTEND)

REMOVAL served: 03/28/25  
Defendant's Motion  
To Dismiss Filed 04/04/25  
Current response date: 04/18/25  
New response date: 04/28/25

1 Pursuant to Local Rule 6-1, Plaintiff, DIGNITY HEALTH (“DIGNITY”), and  
2 Defendant, SILVERSUMMIT HEALTH PLAN, INC. (“SILVERSUMMIT”), by and  
3 through their respective counsel of record, hereby stipulate as follows:  
4

5 WHEREAS, DIGNITY served its Complaint in State Court, which was then  
6 Removed to Federal Court on March 28, 2025, and SILVERSUMMIT filed its Motion to  
7 Dismiss on April 4, 2025;

8 WHEREAS, the parties have been engaged in discussions to determine whether  
9 this matter should be resolved in court or in arbitration in light of the existence of other  
10 disputes between the parties for which DIGNITY has submitted an arbitration demand;  
11

12 WHEREAS, DIGNITY currently has until April 18, 2025, to file its Response to  
13 SILVERSUMMIT’S Motion to Dismiss, and this Stipulation would extend the deadline  
14 by not more than 10 days through and including April 28, 2025;  
15

16 WHEREAS, this is the first time DIGNITY has requested an extension of time to  
17 file its Response;

18 WHEREAS, good cause exists to extend the deadline in light of the parties’  
19 discussions referenced above;  
20

21 ///

22 ///

23 ///

1 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties,  
2 through their respective counsel, **that DIGNITY shall file its Response to**  
3 **SILVERSUMMIT's Motion to Dismiss by end of day April 28, 2025.**  
4

5 Dated: April 17<sup>th</sup>, 2025

6 STEPHENSON, ACQUISTO & COLMAN  
7

8 *Scott B. Van Alfen*

9  
10 SCOTT B. VAN ALFEN  
11 Attorney for  
12 DIGNITY HEALTH

13 Dated: April 17, 2025

14 KAEMPFER CROWELL

15 */s/ Louis M. Bubala III*

16 LOUIS M. BUBALA III  
17 Attorney for  
18 SILVERSUMMIT HEALTH PLAN, INC.  
19

20  
21  
22 IT IS SO ORDERED,

23 By:   
24 U.S. DISTRICT COURT JUDGE

25  
26 Dated this 22nd day of April, 2025.  
27  
28